IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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RALPH S. JANVEY, IN HIS CAPACITY AS	§	
COURT-APPOINTED RECEIVER FOR THE	§	
STANFORD INTERNATIONAL BANK, LTD.,	§	
ET AL.,	§	
	§	
Plaintiff,	§	
	§	
V.	§	Case No. 3:14-cv-3635
	§	
DANIEL BOGAR, OSVALDO PI, AND	§	
BERNERD YOUNG	§	
	§	
Defendants.	§	

RECEIVER'S RESPONSE TO PI'S MOTION FOR LEAVE TO DESIGNATE RESPONSIBLE THIRD PARTIES

Ralph S. Janvey, in his capacity as the Court-appointed Receiver for the Stanford entities hereby files this Response to Defendant Osvaldo Pi's Motion for Leave to Designate Responsible Third Parties, stating as follows:

Pi seeks the Court's leave to designate certain parties (the "Parties") as responsible third parties in the instant litigation. For purposes of preservation of the Receiver's rights on appeal, the Receiver objects to Pi's proposed designation for the reasons articulated in Plaintiffs' Response to Defendant's Motion to Designate Responsible Third Parties in *Janvey v. Adams & Reese LLP, et al.* [See Civ. Action No. 3:12-cv-0495-B, Doc. 76.] The Receiver understands, however, that the Court has ruled adversely to Plaintiffs' position in that case. [See id., Doc. 138.]

The Receiver does not otherwise oppose the designation of the Parties as responsible third parties at this stage. The Receiver notes, however, that whether it is appropriate

to submit the Parties to the jury as responsible third parties is not yet before the court and must be determined based on discovery and the evidence adduced at trial. *See* Tex. Civ. Prac. Rem. Code § 33.004(1) ("After adequate time for discovery, a party may move to strike the designation of a responsible third party on the ground that there is no evidence that the designated person is responsible for any portion of the claimant's alleged injury or damage. The court shall grant the motion to strike unless a defendant produces sufficient evidence to raise a genuine issue of fact regarding the designated person's responsibility for the claimant's injury or damage.").

Dated: August 26, 2015. Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

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ATTORNEYS FOR RECEIVER RALPH S. JANVEY

Case 3:14-cv-03635-N-BQ Document 44 Filed 08/26/15 Page 3 of 3 PageID 705

CERTIFICATE OF SERVICE

On August 26, 2015, I electronically submitted the foregoing document with the clerk of

the court of the U.S. District Court, Northern District of Texas, using the electronic case filing

system of the Court. I hereby certify that I will serve all counsel of record electronically or by

other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Kevin M. Sadler Kevin M. Sadler